

EPA Registration No.
82957-3
vol. 2

Metzger, Autumn

From: Leanne Pruett <Leanne@PyxisRC.com>
Sent: Thursday, November 21, 2013 8:49 AM
To: Metzger, Autumn
Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Thanks, Autumn!

From: Metzger, Autumn [mailto:Metzger.Autumn@epa.gov]
Sent: Thursday, November 21, 2013 8:08 AM
To: Leanne Pruett
Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Hi Leanne,

Here are your stamped labels! Thanks for all your help!

Autumn Metzger
Registration Division
Office of Pesticide Programs
U.S. EPA
703-305-5314

From: Leanne Pruett [mailto:Leanne@PyxisRC.com]
Sent: Tuesday, November 19, 2013 3:31 PM
To: Metzger, Autumn
Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

No worries, Autumn!

Here it is.

Best,
Leanne

From: Metzger, Autumn [mailto:Metzger.Autumn@epa.gov]
Sent: Tuesday, November 19, 2013 1:59 PM
To: Leanne Pruett
Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Ok, one last comment from Venus...sorry, I did not know about this newest change/thoughts about the neonic language:

For 82957-3 on pages 2 & 7, the sub heading that reads "NON-AGRICULTURAL USES:" (under the new neonic stuff) should just be deleted since there are no "Ag" uses. So keep all the statements before, bee icon and restrictions after – just delete the sub heading. Sorry.

Autumn Metzger
Registration Division

Office of Pesticide Programs
U.S. EPA
703-305-5314

From: Leanne Pruett [<mailto:Leanne@PyxisRC.com>]
Sent: Tuesday, November 19, 2013 10:11 AM
To: Metzger, Autumn
Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Hi, Autumn –

They should be on your Turfthor and Prothor labels (attached 'em again in case I sent you the wrong labels).

For Prothor (82957-2), restriction is on page 8, in Restrictions for Exterior Ant Application

For Turfthor (82957), the restriction is in a couple of places – in General Restrictions (pages 2 and 7), Foliar and Broadcast Restrictions (pages 4 and 9) and Application Restrictions for Soil Drench and Soil Injection (pages 5 and 10).

If you think they need to go elsewhere, or there should be more to the restriction than the sentence added ("Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon"), please let me know.

I've got a doctor's appointment this morning, so won't be back until later this afternoon, but I can make any needed changes then.

Best,
Leanne

From: Metzger, Autumn [<mailto:Metzger.Autumn@epa.gov>]
Sent: Tuesday, November 19, 2013 9:36 AM
To: Leanne Pruett
Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Leanne,

Do you want to add the Oregon restriction to both of these? If you plan to register either of these in Oregon they will require that Linden tree restriction. If you do not register in OR I can continue with these last submitted labels. Let me know today (or better yet just add the restriction if you need to and send back today).

Thanks,

Autumn Metzger
Registration Division
Office of Chemical Safety and Pollution Prevention, U.S. EPA
703-305-5314

From: Leanne Pruett [<mailto:Leanne@PyxisRC.com>]
Sent: Thursday, November 14, 2013 4:59 PM
To: Metzger, Autumn
Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Shoot, Autumn!!!

I FORGOT to add in the Ensystex updated address (the registrant specifically asked me to do so).

Here are updated labels for the Protor and the Turfthor, with an updated address for Ensystex III. That's the only change on these labels. You can tell these are the updated ones, because I've got 'address update' in the electronic label name.

Sorry about that!

Best,
Leanne

From: Metzger, Autumn [<mailto:Metzger.Autumn@epa.gov>]
Sent: Thursday, November 14, 2013 3:09 PM
To: Leanne Pruett
Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Hi Leanne,

This all sounds fine. We just heard about OR yesterday, but I appreciate you sending me the letter.

Autumn Metzger
Registration Division
Office of Chemical Safety and Pollution Prevention, U.S. EPA
703-305-5314

From: Leanne Pruett [<mailto:Leanne@PyxisRC.com>]
Sent: Thursday, November 14, 2013 2:40 PM
To: Metzger, Autumn
Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Hi, Autumn –

Here are the updated labels for the Ensystex III Turfthor and Prothor.

I'm not sure if you are aware, but the state of Oregon has just recently indicated a label update that must be done for imidacloprid labeling – they want the statement "Do not apply this product, by any application method, to linden, basswood or other Tilia species in the State of Oregon." added to all appropriate labels. I've attached a letter from OR, indicating the need for that change (NOTE – attached letter was not sent specifically to Ensystex III, but the letter applies to all imidacloprid labels in OR. I added this statement in a couple of places to the Turfthor label, and in one place to the Prothor label.

One other note regarding the Prothor label – in your marked up label that you sent, there were several instances where statements were identified as potential Restrictions. In some cases, I made RESTRICTIONS sections, and 'corralled' all the restrictive statements in them. In other sections, it was a little unwieldy to move those statements to a 'Restrictions' section – to me, it read like doing so would impede the flow of the label, so I left those 'as is'. If you want to discuss the changes I made, please let me know, and we can set up a quick call.

Best Regards,
Leanne

From: Metzger, Autumn [<mailto:Metzger.Autumn@epa.gov>]
Sent: Tuesday, November 12, 2013 1:49 PM

To: Leanne Pruett
Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Hi Leanne,

No problem. Thanks for the update. As per my earlier email please send me clean copies only (no tracked).

Autumn Metzger
Registration Division
Office of Chemical Safety and Pollution Prevention, U.S. EPA
703-305-5314

From: Leanne Pruett [<mailto:Leanne@PyxisRC.com>]
Sent: Tuesday, November 12, 2013 1:19 PM
To: Metzger, Autumn
Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Hey, Autumn –

Unfortunately, I'm not going to be able to get the final Turfthor and Prothor labels to you today. I sent them to Ensystex yesterday morning, but the reviewer is out of the office until Thursday. I should be able to get the final labels to you before the end of this week.

To make sure we're all 'on the same page', would you like me to send you the annotated/tracked label text with the corrections I've made? You can check it to see if I properly implemented the necessary changes. If I missed something, I can get that corrected, so that what I send you later this week is correct.

Best,
Leanne

From: Leanne Pruett
Sent: Monday, November 11, 2013 8:36 AM
To: 'Metzger, Autumn'
Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Sorry, Autumn –

I was busy working on some other projects, and had to put these labels off a bit.

I've just completed the updates to these labels, and have just sent them to the client for their review, and have told him that I need to send them to you by the end of the day tomorrow.

Best,
Leanne

From: Metzger, Autumn [<mailto:Metzger.Autumn@epa.gov>]
Sent: Friday, November 08, 2013 2:09 PM
To: Leanne Pruett
Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Leanne,

Do you have the labels completed yet? The last email you only sent the original labels from 9/25/13. Are you able to get me the revised labels by EOB Tuesday? – clean copies only (no tracked).

Autumn Metzger
Registration Division
Office of Chemical Safety and Pollution Prevention, U.S. EPA
703-305-5314

From: Leanne Pruett [<mailto:Leanne@PyxisRC.com>]
Sent: Thursday, October 31, 2013 12:19 PM
To: Metzger, Autumn
Subject: RE: 82957-2 & 82957-3 neonics labels, comment review

Hey, Autumn –

Here are the electronic copies of the labels for Ensysstex III (both tracked and clean).

Best, Leanne

From: Metzger, Autumn [<mailto:Metzger.Autumn@epa.gov>]
Sent: Thursday, October 31, 2013 11:00 AM
To: Leanne Pruett
Subject: RE: 82957-2 & 82957-3 neonics labels, comment review

Sure I'll be at my desk.

Autumn Metzger
Registration Division
Office of Chemical Safety and Pollution Prevention, U.S. EPA
703-305-5314

From: Leanne Pruett [<mailto:Leanne@PyxisRC.com>]
Sent: Thursday, October 31, 2013 10:31 AM
To: Metzger, Autumn
Subject: RE: 82957-2 & 82957-3 neonics labels, comment review

Can we make it 11:15? Just got finished with something that took a little longer than I thought.

I can call you.

L.

From: Metzger, Autumn [<mailto:Metzger.Autumn@epa.gov>]
Sent: Thursday, October 31, 2013 10:13 AM
To: Leanne Pruett
Subject: RE: 82957-2 & 82957-3 neonics labels, comment review

Lets do 11 am EST. Sorry I didn't attach the labels before. We can discuss the other labels generically on the call.

Autumn Metzger

Registration Division
Office of Chemical Safety and Pollution Prevention, U.S. EPA
703-305-5314

From: Leanne Pruett [<mailto:Leanne@PyxisRC.com>]
Sent: Thursday, October 31, 2013 9:43 AM
To: Metzger, Autumn
Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Hi, Autumn –

I'm available today from around 11 AM – 1:30 PM, then from around 3:30 PM to 5 PM (I'm in Raleigh, so that's EDT – same as you). I'm also available on Monday after 1 PM, and all day on Tuesday, also.

These two labels you mention are the Ensyslex II labels (Prothor and Turfthor).

I also did updates for Ensyslex IV labels (83923-1, 83923-2, 83923-3, 83923-4, 83923-5), Envincio labels (87276-4, 87276-5, 87276-6, 87276-10), Amtide labels (83851-7, 83851-8, 83851-12, 83851-13, 83851-20) and Tide Labels (84229-9, 84229-10, 84229-14, 84229-15)

Not sure if you're ready to talk about these yet or not. Maybe the changes that you'll make to the Ensyslex III labels will easily translate over to the other labels.

Best,
Leanne

From: Metzger, Autumn [<mailto:Metzger.Autumn@epa.gov>]
Sent: Thursday, October 31, 2013 9:02 AM
To: Leanne Pruett
Subject: 82957-2 & 82957-3 neonic labels, comment review

Hello Leanne,

I have some label comments for both of these. Once we saw how the "new" language looked in the context of a label it was apparent we needed to add some other statement/restrictions to make the whole thing make sense. I also made some other minor label revisions as part of the general review. I would like to set up a phone call with you today if possible to go over these. I am attaching both copies of the label with my hand-marked comments to make it easier to follow along. If you are not available today I could do Monday afternoon or Tuesday most of the day as well. This call will probably take about 40 minutes.

Statements you will need (easier to copy and paste):

82957-3

Pg 2: above "Non-Ag Uses"

See individual sites for specific pollinator protection application restrictions. If none exist under the specific site, for outdoor foliar applications, follow these application directions.

Pgs 4 & 9: under a section that will be "Restrictions for Foliar applications:"

You can add some sort of referral section to pages 2 new neonic stuff.

Decision Seq: 484037

Action Code: 360, ACTION INITIATED BY THE AGENCY, 110

Decision Status

FFS Start Date:

Tentative Ind: No

Start/Stop Clock

FQPA Clock:

Due Date: 15-Jan-2014

75-Day Due Date:

Days Elapsed:

OPP Target Due Date:

21-Day Due Date:

FFS Original Decision:

Negotiated Due Date:

45/90 Due Date:

Registrant

Predecisional

Add to Bundle?

Response Due Date:

Due Date:

Current Status: CLOSED (20-Nov-2013)

Bundle ID:

Tracking

Create Resubmission

FFS Letters

Waiver Documentation

Action Code History

Secondary Decision

Decision Bundle

75 Day Letters

45/90 Day Screen

Primary Decisions

Decision Milestone

FFS Negotiated Due Dates

OPP Target Due Date

Decision Comments

Payment

Unmatched Payments

Decision Ownership

Receipts

Data Package

Reduced Risk

Meetings & Milestones

FFS Information

Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
S: 943873	Metzger, Autumn	82957-3	09-Mar-2014	3(c)(5) Unconditionally Accepted Ar
resubmission for one last comment from venus to delete the subheading "non-agricultural uses"				
S: 943872	Metzger, Autumn	82957-3	04-Mar-2014	OBJECTION - LABEL DEFICIENCY
resubmission based on numerous "new" pollinator changes, Oregon restriction and other				
S: 941824	Metzger, Autumn	82957-3	15-Jan-2014	OBJECTION - LABEL DEFICIENCY
Amending label to add pollinator language as requested in the agency letter dated 8/15/13.				

Viewing Record 1 of 1

Receipt for Section 3

S: 941824

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Amendment

Billable: ☐ Yes ☒ No

Company: 92957 ENSYSTEX II, INC.

V

Risk Manager: Registration Division, Risk Management Team 1

Product #: 92957-3 Product Name: TURFTHOR WP

Overhaul:

Me Too Section3: Me Too Product Name:

Application Date: 25-Sep-2013

OPP Rec'd Date: 27-Sep-2013

Front End Date: 27-Sep-2013

Risk Manager Send Date: 30-Sep-2013

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredients: ☐

Receipt Description: AMENDMENT

Form A: ☐ Signature Date:

Form B: ☐ Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Paper Label

Electronic Label

View/Edit

9



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 30, 2013

OFFICE OF CHEMICAL
SAFETY
AND POLLUTION
PREVENTION

JANELLE KAY
PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX III, INC.
4110 136TH ST., NW
GIG HARBOR, WA 98332-

PRODUCT NAME: TURFTHOR WP
COMPANY NAME: ENSYSTEX III, INC.
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 82957-3
EPA RECEIPT DATE: 09/27/13

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team I, at (703) 308-8045.

Sincerely,

A handwritten signature in black ink, appearing to be "SK" or similar, is written over the word "Sincerely,".

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

September 25, 2013

Venus Eagle (PM1)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7505P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501
ATTENTION: Pollinator Fast-Track Amendment

RE: Ensystex III, Inc. – submission of label amendment to Imidacloprid products to add pollinator protection language, including the following products:

- Prothor WP (EPA Reg. No. 82957-2)
- Turfthor WP (EPA Reg. No. 82957-3)

Dear Ms. Eagle,

On behalf of Ensystex III, Inc., I am submitting a series of applications to amend the registrations of the above-listed subject products, to add pollinator protection language to the product labels. The language is being added in response to Steven Bradbury's August 15th, 2013 letter regarding Pollinator Protection Labeling for Nitroguanidine Neonicotinoid Products.

In support of these label amendments, the following documents are enclosed for each product:

1. EPA Application Form 8570-1
2. One (1) copy of product label with changes tracked
3. Three (3) copies of product label with changes incorporated
4. One copy of the proposed label on CD
5. Certification with respect to Label Integrity

Additionally, I have enclosed a letter of authorization, allowing Pyxis to act as Ensystex III's agent with EPA.

As per Steven Bradbury's August 15, 2013 letter, these amendments qualify as non-PRIA fast track amendments. If you have any questions or concerns regarding this application for registration, or require additional information, please contact me at (253) 853-7369 or Leanne@PyxisRC.com.

Best Regards,



P. Leanne Pruett
Pyxis Regulatory Consulting

Enclosures
cc: Ensystex III, Inc.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Ensystex III, Inc / 82957-3	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex III, Inc. / Turfthor WP	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Ensystex III, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St., NW, Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed label in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This is a fast track amendment to incorporate the new pollinator protective language.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name P. Leanne Pruett	Title Agent	Telephone No. (Include Area Code) 253-853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name P. Leanne Pruett	5. Date September 25, 2013	

82957-3

08/02/2011

1/7



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 2, 2011

Ross Gilbert, agent for
Ensystex III, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St., NW
Gig Harbor, WA 98332

re: Turfthor WP, EPA Reg. # 82957-3
label amendment – container handling – master label consisting of 2 sub-labels *D438582*
accepted

Dear Mr. Gilbert:

The revised labeling reference to above, submitted in connection with the registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is ACCEPTABLE.

This amendment was submitted to update the container handling directions. During review the registrant explained that the product is sold in two different packages. However, each package type requires different Directions for Use. While these two packages would usually be registered as two separate products, at the registrant's request both packages will be registered under a single EPA registration number but the stamped master label consists of two sub-labels, one for each package type.

Submit two (2) copies of your final printed labeling incorporating the above changes prior to releasing your product for shipment. If the above provisions are not complied with the registration will be subject to cancellation in accordance with FIFRA Section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A copy of the label stamped "accepted" is enclosed for your records. If you have any questions please contact Tom Harris at (703) 308-9423 or harris.thomas@epa.gov

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Rosanna Louie-Juzwiak".

Rosanna Louie-Juzwiak
Product Manager
Insecticide Rodenticide Branch
Registration Division (7505C)

enclosure

[WSP Sub Label]



TURFTHOR WP

For foliar and systemic control of listed insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses*, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

*Not registered for this use in California

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	25.0%
TOTAL:	100.0%

Each water soluble packet contains 1.6 ounces product (0.075 lbs active ingredient)

Keep water soluble packets in outer container until immediately before use. Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-3 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303

20110110 Turfthor WP 82957-3 Master Label containing WP sub label and WSP sub label_EPA comments incorporada.pdf

FIRST AID

If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(866)-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Keep children and pets off treated area until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt and long pants, chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton and shoes plus socks (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

- Do not apply more than 5 water soluble packets of TURFTHOR WP per acre per year. Do not exceed 0.4 lb. active ingredient imidacloprid per acre per year of any product containing imidacloprid.
- Do not apply in greenhouses or nurseries.
- Not for use on turf or plants being grown for sale, for commercial seed production, or for research purposes.
- Not for use on bearing fruit or nut trees.
- Do not apply through an irrigation system.
- TURFTHOR WP is not registered for use on golf courses in the state of California.

ACCEPTED

AUG - 2 2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under:

EPA. Reg. No: **82957-3**

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Enaystex III at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

DILUTION AND MIXING OF TURFTHOR WP

Each TURFTHOR WP outer container contains a number of clear water soluble packets. Do not allow the packets to become wet at any time before putting them into a spray tank at the time of intended mixing. Handling the packets with wet hands or gloves or in a rough manner can cause them to leak. Reseal the outer container if water soluble packets are left inside after opening.

To mix, open the outer container and remove the required number of unopened packets needed for the gallon amount of solution to be mixed. Drop the required number of packets into the spray tank as it is being filled with water with the agitator operating. The elapsed time until the packets are fully dissolved depends on the degree of agitation and the temperature of the water with more time needed for lower levels of agitation and lower temperatures. Generally, a few minutes is sufficient time for the packets to completely dissolve.

Avoid using TURFTHOR WP packets in tanks also containing products that contain boron or free chlorine. The packet material may react with the boron or chlorine to form a non-water soluble compound instead of dissolving into the water. However chlorinated water use is acceptable and will not cause this compound to form or reaction to occur. Because the packets are soluble in water but not oil, do not attempt to use packets in diesel oil or summer spray oils.

APPLICATION FOR TURF PESTS

TURFTHOR WP controls or suppresses a wide range of listed soil inhabiting turfgrass insect pests. TURFTHOR WP is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.

Application Sites

Permitted sites are lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses (not in California), cemeteries, airports and parks.

Application Timing

The active ingredient in TURFTHOR WP, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Do not apply to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply TURFTHOR WP.

Turf Application Use Rates

Use Rate Table for TURFTHOR WP for Turf Applications		
Use Rate	Ounces (Packets) per sq. foot	Packets per acre
A	1.6 ounces (1 packet) per 8,250 to 11,000 sq. ft.	4
B	1.6 ounces (1 packet) per 8,250 sq. ft.	5

Turf Application Volumes

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate (0.4 lbs a.i. per acre per year) is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass stemless, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, Phyllophaga spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Application Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adjuvant in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

Calculating Amounts of TURFTHOR WP to Mix for Turf Pests

To mix and apply any amount of TURFTHOR WP for turf pests based on number of acres, determine:

A = # of acres of area to be treated = square feet of area to be treated / 43,560 (1 acre = 43,560 sq. ft.)

B = Applicable TURFTHOR WP Use Rate (packets per acre) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Packets TURFTHOR WP to use = A x B. Round down to nearest integer.

example: (56,628 sq. feet / 43,560 sq. feet) x (5 packets / acre) = 6.5 = round down to use 6 packets

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

Maximum Applications Per Year

Limited to one application per year for turf.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of listed insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Application Sites

For use on ornamental trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites are landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses (not in California) and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against listed insect pests. Applications to plants with hard to wet foliage such as holly, pine or ivy should be applied in combination with a spreader / sticker.

Ornamental Application to Control Ants (except fire, pharaoh, harvester, carpenter ants)

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed up to a maximum of 5 water soluble packets per acre per year. Do not apply more than 0.4 lb. imidacloprid per acre per year of any product containing imidacloprid.

Mixing Table for TURFTHOR WP for Foliar Applications	
1.6 ounces (1 packet)	per 300 gallons of water.

Ornamental Pests Controlled by Foliar Application

Adeigids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for TURFTHOR WP for Broadcast Applications	
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1.6 ounces (1 packet) per 8,250 to 11,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate (0.4 lbs a.i. per acre per year).

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of listed insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants, trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses (not in California) and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Trees

1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees

1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs

1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs

1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

ADDITIONAL RESTRICTIONS

Do not apply more than 5 water soluble packets of Turfthor WP per acre per year (0.4 lbs imidacloprid per acre per year of any product containing imidacloprid).

Do not graze treated areas or use clippings from treated areas for feed or forage.

Do not irrigate to point of runoff or puddling following application.

Do not apply to waterlogged, saturated, or frozen soils since this will prevent penetration to the root zone.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensyntex III, Inc., it is impossible for Ensyntex III to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensyntex III harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable laws, Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ENSYSTEX III MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensyntex III, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensyntex III shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX III AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX III, THE REPLACEMENT OF THE PRODUCT.

These Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

TURFTHOR is a registered trademark of Ensyntex III, Inc.

[WP Sub Label]



TURFTHOR WP

For foliar and systemic control of listed insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses*, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

*Not registered for this use in California

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	<u>25.0%</u>
TOTAL:	100.0%

Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-3 EPA Est. 81824-NC-001

STOP – Read the label before use
KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303

FIRST AID

If swallowed	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15 to 20 minutes.• Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(866)-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Keep children and pets off treated areas until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt and long pants, chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton and shoes plus socks (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

- Do not apply more than 8.6 ounces (0.4 lb. a.i.) of TURFTHOR WP per acre per year for any type(s) or combination(s) of applications.
- Do not apply in greenhouses or nurseries.
- Not for use on turf or plants being grown for sale, for commercial seed production, or for research purposes.
- Not for use on bearing fruit or nut trees.
- Do not apply through an irrigation system.

TURFTHOR WP is not registered for use on golf courses in the state of California.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinse into application equipment or a mix tank or store rinse for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Enzyx III at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

DILUTION AND MIXING OF TURFTHOR WP

To mix, measure out the required amount of TURFTHOR WP. Pour this amount of TURFTHOR WP into the spray tank as it is being filled with water with the agitator operating.

Do not use kitchen utensils to mix or apply this product. Use equipment dedicated to pesticide measurement and application.

APPLICATION FOR TURF PESTS

TURFTHOR WP controls or suppresses a wide range of listed soil inhabiting turfgrass insect pests. TURFTHOR WP is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.

Application Sites

Permitted sites are lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses (not in California), cemeteries, airports and parks.

Application Timing

The active ingredient in TURFTHOR WP, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Do not apply to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply TURFTHOR WP.

Turf Application Use Rates

Use Rate Table for TURFTHOR WP for Turf Applications		
Use Rate	Ounces per acre	Teaspoons per 1,000 sq. feet
A	6.4-8.6 ounces per acre	3-4 level teaspoons per 1,000 sq. ft.
B	8.6 ounces per acre	4 level teaspoons per 1,000 sq. ft.

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP = 0.05 oz. TURFTHOR WP

3 level teaspoons = 1 tablespoon

Turf Application Volumes

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate (8.6 ounces Turfthor WP per acre per year; 0.4 lb. imidacloprid per acre per year) is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate (8.6 ounces Turfthor WP per acre per year; 0.4 lb. imidacloprid per acre per year).

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass sternalis, Cutworms (suppression only), European chafer, European Crane Fly,

Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phytophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Application Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adjuvant in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

Calculating Amounts of TURFTHOR WP to Mix for Turf Pests

To mix and apply any amount of TURFTHOR WP for turf pests based on number of square feet, determine:

A = # of Square feet of area to be treated / 1000. (for example 5,500 sq. ft. / 1000 = 5.5)

B = Applicable TURFTHOR WP Use Rate (teaspoons per 1000 square feet) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Teaspoons TURFTHOR WP to use = A X B

Ounces TURFTHOR WP to use = A X B X 0.05

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of listed insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Application Sites

For use on ornamental trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses (not in California) and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against listed insect pests. Applications to plants with hard to wet foliage such as holly, pine or ivy should be applied in combination with a spreader / sticker.

Ornamental Application to Control Ants (except fire, pharaoh, harvester, carpenter ants)

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed up to a maximum of 0.4 lb. a.i. per acre per year.

Mixing Table for TURFTHOR WP for Foliar Applications	
Gallons Water	Level Teaspoons TURFTHOR WP
2.5	0.25
5.0	0.50
10.0	1.00
25.0	2.50
50.0	5.00
100.0	10.00

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP = 0.05 oz. TURFTHOR WP

3 level teaspoons = 1 tablespoon

Ornamental Pests Controlled by Foliar Application

Adeigids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for TURFTHOR WP for Broadcast Applications

6.4-8.6 ounces per acre / 3-4 level teaspoons per 1,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate (0.4 lb. a.i. per acre per year).

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phytophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of listed insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 80 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites are landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses (not in California) and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Trees

0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH)* /
1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)*

*DBH = Diameter at Breast Height measured at 4.5 feet above the ground

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees

0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) *

1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)*

*DBH = Diameter at Breast Height measured at 4.5 feet above the ground

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs

0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height/
1 to 2 ounces per 30 cumulative feet of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs

0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height/
1 to 2 ounces per 30 cumulative feet of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

ADDITIONAL RESTRICTIONS

Do not apply more than 8.6 ounces of Turfthor WP per acre per year (0.4 lb. Imidacloprid per acre per year of any product containing Imidacloprid.)

Do not graze treated areas or use clippings from treated areas for feed or forage.

Do not irrigate to the point of runoff or puddling following application.

Do not apply to waterlogged, saturated, or frozen soils since this will prevent penetration to the root zone.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensysstex III, Inc., it is impossible for Ensysstex III to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensysstex III harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable laws, Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ENSYSTEX III MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensysstex III, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensysstex III shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX III AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX III, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

TURFTHOR is a registered trademark of Ensysstex III, Inc.

[EPA approval date]

scan's got cut
off, this is all we
have but important
to save.



RE: Additional revisions for Ensystex III Turfthor WP EPA Reg. No.
82957-3

Ross Gilbert to: Thomas Harris

01/10/2011 02:26 PM

Tom,

I have created a master label with both sub labels and incorporated all the comments you detail below. PDF attached.

Best wishes for the New Year,

Ross

Ross Gilbert
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
E: Ross@PyxisRC.com
T: 1-253-853-7369
F: 1-253-853-5516

-----Original Message-----

From: harris.thomas@epamail.epa.gov [mailto:harris.thomas@epamail.epa.gov]
Sent: Monday, January 03, 2011 10:29 AM
To: Ross Gilbert
Subject: Additional revisions for Ensystex III Turfthor WP EPA Reg. No.
82957-3

Ross,

Happy New Year! Sorry this took so long to get back to you. I try to keep revisions going once we start; just got buried by a few PRIA deadlines.

Attached is another round of comments. I noticed that you had missed a couple of my previous corrections. Also, I sent this on for PM review and they noted additional corrections. This should be it once these are done. Just email me back a revised label.

IMPORTANT: The two sub-labels should be combined into a single "master" label. I've done that in the marked up versions attached (WSP first then WP). It is this master label that will be stamped. You can then subset the master by using either one of the two pieces when you label the container for sale. Not sure how you handle the state registration; I'll leave that up to you and each state.

EPA/OCSP/OPP/RD/IRB
voice: (703) 308-9423
fax: (703) 308-0029
harris.thomas@epa.gov
visit <http://www.epa.gov/pesticides>

From: Ross Gilbert <Ross@PyxisRC.com>
To: Thomas Harris/DC/USEPA/US@EPA
Date: 12/03/2010 01:51 PM
Subject: RE: Create two sub-labels under one master label for Ensystex
III Turfthor WP EPA Reg. No. 82957-3

Tom,

I've made the changes and attach the pdf files as requested.

Please let me know if there is anything else we need to cover.

Best,

Ross

Ross Gilbert
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4110 136th St. NW
Gig Harbor, WA 98332
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-----Original Message-----

From: harris.thomas@epamail.epa.gov [mailto:harris.thomas@epamail.epa.gov]
Sent: Monday, November 22, 2010 3:03 PM
To: Ross Gilbert
Subject: RE: Create two sub-labels under one master label for Ensystex III
Turfthor WP EPA Reg. No. 82957-3

Ross,

Getting there. A few more changes. Please revise the label and send me a text pdf of the label (you sent .doc last time).

for those). Change header to read: "Ornamental Application to Control Ants (except fire, Pharoah, harvester, carpenter ants)".

4) p. 3, Additional Restrictions: State first item in terms of packets: "Do not apply more than 5 water soluble packets of Turthor WP per acre per year (0.4 lbs imidacloprid"

5) p. 4-6, footer: Change the footer for pages 3-6 to read "WP label" instead of "WSP label".

6) p. 4, DFU: typo on 0.4. Change bolded limit to read: "Do not apply more than 8.6 ounces (0.4 lb a.i.) of TURFTHOR WP per acre per year"

Tom Harris
EPA/OCSPP/OPP/RD/IRB
voice: (703) 308-9423
fax: (703) 308-0029
harris.thomas@epa.gov
visit <http://www.epa.gov/pesticides>

From: Ross Gilbert <Ross@PyxisRC.com>

To: Thomas Harris/DC/USEPA/US@EPA

Date: 11/09/2010 01:12 PM

Subject: RE: Create two sub-labels under one master label for
Ensystex III Turfthor WP EPA Reg. No. 82957-3

Tom,

I attach the Ensystex Turfthor WP with the edits you specified in your attachment.

As for point 7) in your general observations below, you raise an interesting point! We looked at a number of other, similar imidacloprid labels, including Bayer Merit 75 WP (EPA Reg. No. 432-1314 - also attached) which was the label upon which the original registration was based, and could not find a clarified rate for this type of application, beyond the general maximum use rate.

Thanks and regards,

I've attached a marked-up copy of the 10/18/10 version of 82957-3 (both
a) a print image that you can simply print and it will show comments and
b) a "live" version of the mark-up which is larger type but you'll have to
open all the comment boxes manually).
>>>> Please edit as indicated and email me a revised version.

print this version: (See
attached file:
082957-00003.20101018.20101018 Turfthor WP PRN 2007-4 label notification_sub
labels per Thomas Harris email 20101015.EPA COMMENTS.PRINT IMAGE.pdf)

"live" version: (See
attached file:
082957-00003.20101018.20101018 Turfthor WP PRN 2007-4 label notification_sub
labels per Thomas Harris email 20101015.EPA
COMMENTS.pdf)

A few general observations:

- 1) You can delete pages 1-4 since they are the old combined WSP and WP label that we're trying to clarify.
- 2) Somewhere on each page include something like the text I've written on the bottom of each page to indicate which label that page goes with and what the master label is made of. Master label is made up of two sub-labels (see why I said it's easier if these are two different reg # products !).
- 3) A lot of the edits have to do with EPA's push to clarify mandatory vs advisory labeling. While there are legitimate times to use them, you should be careful with the words "general", "recommend", "avoid", "including", "should", et al since these indicate advisory text (replace them when text is supposed to be mandatory).
- 4) Add the size of each WSP (both in terms of product and a.i.) under ingredient statement on the WSP label.
- 5) Rewrite mixing directions for WSP so they are given in terms of # of water soluble packets per something.
- 6) For WP mixing directions, the tsp directions are ok but add something similar for larger volumes in ounces of product.
- 7) I'm not sure how to express limits for soil inject and soil drench (i.e. how to equate these with 0.4 lb a.i./acre/year limit). Any ideas?

Tom Harris
EPA/OPPTS/OPP/BD/THH

Cc: Mike Keillogg <Mike@PyxisRC.com>

Date: 10/18/2010 04:56 PM

Subject: RE: Create two sub-labels under one master label for
Ensysstex III Turfthor WP EPA Reg. No. 82957-3

Dear Mr Harris,

Thanks for your e-mail, and your understanding.

I have done as you suggested in your e-mail below, and I attach the pdf document you requested.

Please could you indicate whether the Master label plus the 2 sub labels you suggested are acceptable?

Thanks and best regards,

Ross

Ross Gilbert
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F: 1-253-853-5516

-----Original Message-----

From: harris.thomas@epamail.epa.gov [
mailto:harris.thomas@epamail.epa.gov]
Sent: Friday, October 15, 2010 10:00 AM
To: Ross Gilbert
Cc: Eagle.Venus@epamail.epa.gov
Subject: Create two sub-labels under one master label for Ensysstex III
Turfthor WP EPA Reg. No. 82957-3

Mr. Gilbert,

Thanks for the explanation. Now it makes sense, although I'm sure I'm not the last regulatory reviewer to be confused by the current label since the directions are very different for the two package types.

We normally require products with the same formula but different use directions due to packaging (eg. WSP and WP) to be registered as two separate products. However, OPP will allow you to continue to track the two packages

master label containing two sub-labels and I'll continue processing this under the current action. You do not need to submit any other paperwork or to send paper copies via the mail.

Tom Harris
EPA/OPPTS/OPP/RD/IRB
voice: (703) 308-9423
fax: (703) 308-0029
harris.thomas@epa.gov
visit <http://www.epa.gov/pesticides>

From: Ross Gilbert <Ross@PyxisRC.com>
To: Thomas Harris/DC/USEPA/US@EPA
Date: 09/02/2010 04:52 PM
Subject: Ensysstex III Turfthor WP EPA Reg. No. 82957-3

Ensysstex III Turfthor WP EPA Reg. No. 82957-3

Dear Mr Harris,

Thank you for your letter dated 8/16/10 regarding the above product and a notification we submitted dated 3/4/2010 .

Having read your comments, I'd like to offer the following clarification:

1. Turfthor WP is packaged in 2 distinct ways:
 - a. In water soluble packets (WSP); and
 - b. As a wettable powder (non-WSP).

Both the WSP and non-WSP are in turn packaged in a HDPE plastic bottles (to which the disposal language relates).

The packaging arrangements were included as an addendum to the application form 8570-1, and I attach a copy for ease of reference.

2. The label contains mixing directions for both WSP and non-WSP. For example, please see the second page of the submitted label under the heading "Turf Application Use Rates" where you can see that reference is made to both packet quantities for WSP in the first table and ounces/teaspoons for non-WSP in the second table. There is also alternative language under the heading.

does. If you would like to discuss this further, please contact me by e-mail or at the telephone number below.

Thanks and regards,

Ross

Ross Gilbert
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4110 136th St. NW
Gig Harbor, WA 98332
E: Ross@PyxisRC.com
T: 1-253-853-7369
F: 1-253-853-5516

(See attached file: 20100304 application supplement for 8570-1.doc)
[attachment "20101018 Turfthor WP PRN 2007-4 label notification_sub labels per Thomas Harris email 20101015.pdf" deleted by Thomas Harris/DC/USEPA/US]
[attachment "20101105 Turfthor WP label revisions per Thomas Harris email 20101101.doc" deleted by Thomas Harris/DC/USEPA/US] [attachment "432-1314 Merit 75 WP Insecticide PPLS label dated 20090501.pdf" deleted by Thomas Harris/DC/USEPA/US] [attachment "20101203 Turfthor WP_WP Sub Label.pdf" deleted by Thomas Harris/DC/USEPA/US] [attachment "20101203 Turfthor WP_WSP sub label.pdf" deleted by Thomas Harris/DC/USEPA/US]



20110110 Turfthor WP 82957-3 Master Label containing WP sub label and WSP sub label_EPA comments incorporateda.pdf

Ensysyex III Turfthor WP EPA Reg. No. 82957-3

Ross Gilbert o Thomas Harris

09/02/2010 04:52 PM

Ensysyex III Turfthor WP EPA Reg. No. 82957-3

Dear Mr Harris,

Thank you for your letter dated 8/16/10 regarding the above product and a notification we submitted dated 3/4/2010 .

Having read your comments, I'd like to offer the following clarification:

1. Turfthor WP is packaged in 2 distinct ways:

- a. In water soluble packets (WSP); and
- b. As a wettable powder (non-WSP).

Both the WSP and non-WSP are in turn packaged in a HDPE plastic bottles (to which the disposal language relates).

The packaging arrangements were included as an addendum to the application form 8570-1, and I attach a copy for ease of reference.

2. The label contains mixing directions for both WSP and non-WSP. For example, please see the second page of the submitted label under the heading "Turf Application Use Rates" where you can see that reference is made to both packet quantities for WSP in the first table and ounces/teaspoons for non-WSP in the second table. There is also alternative language under the heading, "Calculating Amounts of Turfthor WP to Mix for Turf Pests", and throughout the label there are 2 tables under each section: one for WSP and one for non-WSP purposes.

3. Although the master label submitted to EPA contains both language for WSP and no-WSP forms of the product, the language on the final label for WSP and non-WSP products is specific to the type of product contained within i.e. the non-WSP product does not contain the WSP language and vice versa. This removes the risk that the user would be misled into attempting to open the WSP in order to measure amounts of product.

I hope this clarifies matters somewhat, and explains why the label reads as it does. If you would like to discuss this further, please contact me by e-mail or at the telephone number below.

Thanks and regards,

Ross

Explore Registrations				
Reg Number:	82957-3	Reg. Type:	Product Registration - Section 3	Status:
Name:	TURFTHOR WP			<View Registration Details>
(No New Receipts)				
S:	Submission Type	OPP Rec'd Date	Resubmission	Description
<div> <div> ...Decisions... <ul style="list-style-type: none"> Data Requirements D: Pending; 438582; 82957-3;300;LABEL REVISION 75-Day Letters S: 880493 8/16/2010, Amendment: 82957 D: Closed; 430260; 82957-3;332;NOTIFICATION D: Closed; 385835; 82957-3;370;CONDITIONAL D: Closed; 382917; 82957-3;332;NOTIFICATION D: Closed; 378555; 82957-3;332;NOTIFICATION D: Closed; 378554; 82957-3;332;NOTIFICATION D: Closed; 377715; 82957-3;300;LABEL REVISION D: Closed; 376162; 82957-3;332;NOTIFICATION D: Closed; 375326; 82957-3;332;NOTIFICATION D: Closed; 375325; 82957-3;332;NOTIFICATION D: Closed; 364318; 82957-3;R33.4;NEW MANUF </div> <div> S: 880493 Reg #: 82957-3 <p>Submission Type: Amendment</p> <p>Resubmission?: <input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Decision #: 438582; 300;LABEL REVISION;NO DATA REQUIRED;</p> <p>Submitter Company: ENSYSTEX II, INC</p> <p>Application Date: 16-Aug-2010</p> <p>OPP Received Date: 16-Aug-2010 Date Sent to Risk manager: 16-Aug-2010</p> <p>Studies Included?: <input type="radio"/> Yes <input checked="" type="radio"/> No Fast Track?: <input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>Form A Signed?: <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> None Date: </p> <p>Form B Signed?: <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> None Date: </p> <p>Reviewer: Harris, Thomas</p> <p>Received DT: 16-Aug-2010 Editable Due DT: </p> <p>Submission Due DT: 14-Nov-2010 Response: 1135, 16-Aug-2010</p> <p>Priority Weight: Priority Points: </p> <p>Comments: convert unacceptable notification to amendment</p> </div> </div>				

0.4 lb ai/A
max on turf



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

800 24 1234

email sent dated

9/2/10

8/16/2010

with copy as requested.

Ross Gilbert
Ensystex III, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Subject: Label Notification for Pesticide Registration Notices 2007-4

Dear Mr. Gilbert:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 3/4/2010 for the product EPA Reg. # 82957-3, Turfthor WP. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested does not clearly fall within the scope of PRN 98-10 and will require additional administrative review of the related files. A summary of our findings include:

Note: All these corrections are based on the assumption that this is a dry formulation packed in water soluble packages. If that is not correct then we need to discuss the labeling further.

1. Container Disposal Text

Since this is a dry product packed in water soluble packages the concept of rinsing the container with water is not appropriate. Unused water soluble packages still in the foil outer pouch should be disposed of per "pesticide disposal" directions.

Replace the container handling text with the following:

"Container handling: Nonrefillable container. Do not reuse or refill this container. Offer empty outer container and empty foil outer pouch for recycling if available or dispose of in a sanitary landfill, or by other procedures allowed by state and local authorities."

2. Front Panel, product name

Strongly suggested: Since this is a Water Soluble Package, not a Wettable Powder type product it would be clearer to rename the product "Turfthor WSP" instead of "Turfthor WP".

3. Front panel, ingredients

Follow the ingredients list with a description of the weight of each water soluble

packet, eg. a 20 lb box could say "contains 20 water soluble packets packaged in a foil outer pouch each containing 1 lb product."

4. Directions for Use, Dilution and Mixing

Delete the second paragraph that states "to mix, measure out the required amount" Keep the current third paragraph which correctly states how to drop the required number of unopened water soluble packets into the spray tank.

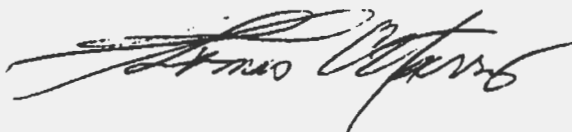
5. Directions for Use, Calculating Amounts of Turfthor WP to Mix for Turf Pests

Rewrite the current text which refers to teaspoons per 1000 square feet. The user is only able to use quantities which are pre-measured into the water soluble packets. The user should not open the water soluble packets to measure other quantities of product.

Therefore, the RD has determined that this action is denied and will be further processed as an amendment and our records have been updated accordingly.

Please submit a revised label correcting the issue identified above. If possible, please include a text .pdf of the revised label on CD-ROM along with your application. If you have any questions please do not hesitate to call me.

Sincerely yours,



Thomas C. Harris
Biologist
Insecticide Rodenticide Branch
Registration Division (7505P)
Harris.Thomas@epa.gov
(703) 308-9423

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
82957-3	September 25, 2013	082957-00003.20130925.Turfthor WP bee protection language.PDF

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.


Signature

9-25-2013
Date

P. Leanne Pruett
Name (typed)

Agent
Title

ENSYSTEX III, Inc.

2709 Breezewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA
Telephone - 1-910-484-6163 x 203 Fax - 1-910-484-3378 Email david@ensystex.com

November 2, 2005

To Whom It May Concern:

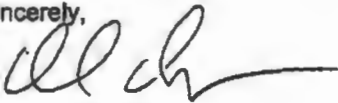
Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensystex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

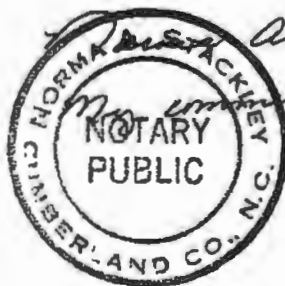
Sincerely,



David Nimocks
Chairman

cc: Pyxis Regulatory Consulting, Inc.

Notary



PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

March 4, 2010

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex III, Inc. – Turfthor WP (EPA Reg. No. 82957-3)
Revision to Container Disposal Instructions per PRN 2007-4

Dear Ms. Eagle,

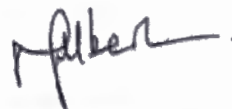
On behalf of Ensystex III, Inc. please find the enclosed label notification revising the container disposal instructions for Prothor WP per PRN 2007-4.

In support of this notification submission, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Turfthor WP labeling with changes tracked
3. One (1) copy of the Turfthor WP labeling with changes incorporated
4. Certification with Respect to Label Integrity
5. One (1) copy of the Turfthor WP labeling on CD
6. Letter of Authorization

Please feel free to contact me by phone (253) 853-7369 or by email at Ross@PyxisRC.com if you have any questions or need any additional information.

Sincerely,



Ross Gilbert

Enclosures

cc: D. Nimocks; Ensystex III, Inc



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 82957-3	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex III, Inc. / Turfhor WP	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Ensystex III, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____ see attached	
* Certification must be submitted		If "Yes" Unit Packaging wgt. _____ No. per container _____	If "Yes" Package wgt. _____ No. per container _____		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container see attached		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ross Gilbert	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Ross Gilbert	5. Date 3/4/10	

Application for Registration (cont'd)

RE: Turfthor WP 82957-3

Section III

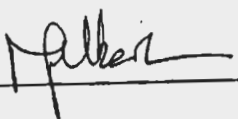
Turfthor WP will be packaged in Water Soluble Packaging (WSP) and HDPE plastic bottles

Water Soluble Packaging (WSP):

1.6 oz. (4, 16, or 88 per container) – water-soluble packets will be contained within HDPE plastic bottles.

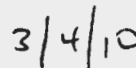
Plastic Container Packaging (Non-WSP):

Ensysrex III, Inc. may also package Turfthor WP in 16 oz. and 32 oz. HDPE plastic bottles.



Ross Gilbert
Pyxis Regulatory Consulting, Inc.

Date



3/4/10

Certification with Respect to Label Integrity

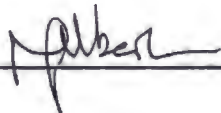
version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
82957--3	March 4, 2010	082957-00003.20100304.PRN 2007-4 lbl notification.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature



Date

3/4/10

Ross Gilbert

Name (typed)

Agent

Title

ENSYSTEX III, Inc.

2709 Breesewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA
Telephone - 1-910-484-6163 x 203 Fax - 1-910-484-3378 Email david@ensystex.com

November 2, 2005

To Whom It May Concern:

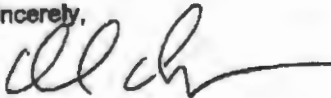
Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensystex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

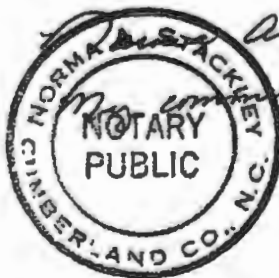
Sincerely,



David Nimocks
Chairman

cc: Pyxis Regulatory Consulting, Inc.

Notary





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 2 | RECD

NOV 24 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Michael Kellogg
~~Etiga LLC~~ *Eusystex IV, Inc*
c/o Pyxis Regulatory Consulting, Inc.
4110 136th Street, NW
Gig Harbor, WA 98332

Subject: Submission of Storage Stability and Corrosion Characteristics Studies
Turfthor WP
EPA Reg. No. 82957-3
Your Submission date, October 25, 2007

Dear Mr. Kellogg:

The Agency has received and reviewed the requested above mentioned studies. The studies are acceptable and your requirement for the registration of the above product is complete. Thank you for your prompt completion of the data for this section 3 registration. If there are questions call me at 703 305-5409.

Sincerely,

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division 7505P

DATE OUT:

SUBJECT: STORAGE STABILITY (830.6317) & CORROSION CHARACTERISTICS
(830.6320) REVIEW
ACCELERATED STUDY ☐; ONE YEAR STUDY ☐;
OVER 1 YEAR STUDY ☒
MP ☐ EP ☒ EUP ☐
DP BARCODE No.: 346330 REG. No.: 82957-3
DECISION No.: 385835 MRID No(s): 472652-1
PRODUCT NAME: TURFTHOR WP
COMPANY: ENSYTEX III. INC.

FROM: William Herald / Reviewer
Product Chemistry Team
Technical Review Branch/RD (7505P)

Handwritten: 8/19/08
SBM 8/26/08

TO: Venus Eagle / Dani Daniel, PM Team 1
Insecticide-Rodenticide Branch / RD (7505P)

I. CONCLUSIONS:

STORAGE STABILITY (830.6317):
☒ ACCEPTABLE
☐ UNACCEPTABLE*
☐ UPGRADEABLE*

40CFR158.190 DATA REQUIREMENT: ☒ SATISFIED ☐ NOT SATISFIED

CORROSION CHARACTERISTICS (830.6320):
☒ ACCEPTABLE
☐ UNACCEPTABLE*
☐ UPGRADEABLE*

40CFR158.190 DATA REQUIREMENT: ☒ SATISFIED ☐ NOT SATISFIED

* If unacceptable or upgradeable describe the deficiency and provide recommendations

Comments & Recommendations:

II. STUDY SUMMARY

A. STUDY CONDUCTED UNDER US GLP/OECD GUIDELINES

☒ Yes
☐ No

B. PRODUCT INFORMATION

Active Ingredient(s): Imidacloprid
Label claim(s) Nominal concentration(s) (%): 75.0%Imidacloprid
Initial concentration(s) of the AI(s) (%) used in the study: 75.17% Imidacloprid
Lower certified limits (%) based on AI % in the study: 72.9149% Imidacloprid

C. EXPERIMENTAL PARAMETERS

Temperature: "ambient temperature"
Humidity: Indicate % (If provided)
Duration of study: ☐ 1 year; ☒ over 1 year
Type of container: transparent, rectangular shaped, "Water Soluble Bags"
Analysis at intervals: ☒ 0 (Initial);
☒ 3 months; ☒ 6 months
☒ 9 months; ☒ 12 months
☒ Over 12 months

D. ANALYTICAL METHOD

Method	DETECTOR
High Pressure Liquid chromatography (HPLC)	• UV/VIS 252nm

E. RESULTS

The report shows that following the initial characterization of the AI:

- 1) After storage at ambient temperature for periods of 3, 6, 9, 12, and 18 months the AI% remained well within the required statutory parameters (40 CFR § 158.175).
- 2) There were no reported impurities during any point of the 18 month study.
- 3) There were no reported adverse reactions involving the product with the transparent, rectangular shaped, "Water Soluble Bag" container. The report recites that visual observations were made of the container, and there were no reported remarkable changes in the shape or color. The bag container developed no cracks, perforations, darkening or leakage at the seam at no time during the 18 month study period.
- 4) The report recites that study was validated for linearity, standard accuracy and precision



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

1001 8

October 30, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ENSYSTEX III, INC.
4110 136TH ST., NW
GIG HARBOR, WA 98332-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 29-OCT-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 25, 2007

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (AMEND)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex III Inc. – Turfthor WP (82957-3)
Submission of Storage Stability and Corrosion Characteristic Study per the Agency letter dated November 2, 2006

Dear Ms. Eagle,

On behalf of Ensystex III Inc. and in response to the Agency letter dated November 2, 2006, please find the enclosed storage stability and corrosion characteristics study for Turfthor WP (EPA Reg. No. 82957-3).

In support of this submission, please find the enclosed:

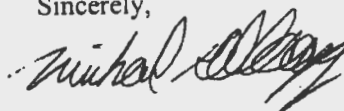
1. Completed Application for Registration (EPA Form 8570-1)
2. Product Specific Chemistry Data (3 copies):

47265201 Volume 1 830.6317; 830.6320 Vohra, Y., Storage Stability and Corrosion Characteristics of Imidathor 75 WP.

Please note: Imidathor 75 WP and Turfthor WP are the same product. Ensystex III changed the product name from Imidathor 75 WP to Turfthor WP just prior to submitting the application for registration.

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: David Nimocks; Ensystex III, Inc.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 82957-3	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex III, Inc. / Turfthor WP	PM# 01	
5. Name and Address of Applicant (Include ZIP Code) Ensystex III, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated 11/2/2006	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of storage stability and corrosion characteristics study per the Agency letter dated November 2, 2006.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Michael Kellogg		Title Agent	
		Telephone No. (Include Area Code) 253-853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent	
4. Typed Name Michael Kellogg		5. Date 10/25/07	

82957-3

8.24.2007

1/8



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

AUG 24 2007

Michael Kellogg
Agent for Ensystex III, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

SUBJECT: Application for Pesticide Notification – Add Golf Course Restriction in CA
Turfthor WP
EPA Reg. No. 82957-3
Application Dated July 19, 2007

Dear Mr. Kellogg:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 82957-3	2. EPA Product Manager J. Hebert	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex III, Inc. / Turfthor WP	PM# 7	
5. Name and Address of Applicant (Include ZIP Code) Ensystex III, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	NOTIFICATION AUG 24 2007
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of minor label revisions per PR Notice 98-10 to facilitate registration in the State of California. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name Michael Kellogg		Title Agent		
		Telephone No. (Include Area Code) 253-853-7369		
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)	
2. Signature 		3. Title Agent		
4. Typed Name Michael Kellogg		5. Date 7/19/07		

3/8

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

July 19, 2007

COURIER DELIVERY

John Hebert (PM 7)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

NOTIFICATION
AUG 24 2007

RE: Ensystex III, Inc. – Turfthor WP (EPA Reg. No. 82957-3)
Notification of Minor Label Revisions per PRN 98-10 to Facilitate Registration in the State of California

Dear Mr. Hebert,

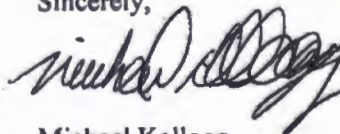
On behalf of Ensystex III, Inc, please find the enclosed notification of minor label revisions for Turfthor WP (EPA Reg. No. 82957-3). California specific language (restricting use on golf courses in California) is being added to facilitate registration of Turfthor WP in the state of California.

In support of this notification, please find the following:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Turfthor WP label with changes tracked
3. One (1) copy of the Turfthor WP label with changes incorporated
4. Letter of Authorization

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: David Nimocks; Ensystex III, Inc.

ENSYSTEX III, Inc.

2709 Breezewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA
Telephone - 1-910-484-6163 x 203 Fax - 1-910-484-3378 Email david@ensystex.com

November 2, 2005

NOTIFICATION

AUG 24 2007

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensystex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

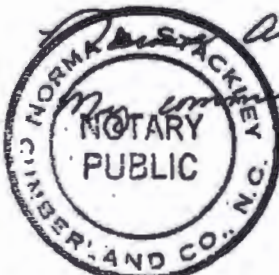
Sincerely,



David Nimocks
Chairman

cc: Pyxis Regulatory Consulting, Inc.

Notary

Norma A. Stackley, Notary Public
My commission expires 4-21-06




NOTIFICATION
AUG 24 2007

TURFTHOR WP

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses*, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

*Not registered for this use in California

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	25.0%
TOTAL:	100.0%

Keep water soluble packets in outer container until immediately before use. Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-3 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303

FIRST AID

If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(866)-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Keep children and pets off treated area until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt and long pants, chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton and shoes plus socks (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

Do not apply more than 8.6 ounces (0.04 lbs.) of TURFTHOR WP per acre per year for any type(s) or combination(s) of applications.

Do not apply in greenhouses or nurseries.

Not for use on sod farm turf or grass grown for commercial seed production.

Not for use on bearing fruit or nut trees.

Do not apply through an irrigation system.

TURFTHOR WP is not registered for use on golf courses in the state of California.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Enaystex III at 1-866-367-6467 or Chemfree at 1-800-424-9300 for any assistance.

DILUTION AND MIXING OF TURFTHOR WP

Each TURFTHOR WP outer container contains a number of clear water soluble packets. Do not allow the packets to become wet at any time before putting them into a spray tank at the time of intended mixing. Handling the packets with wet hands or gloves or in a rough manner can cause them to leak. Reseal the outer container if water soluble packets are left inside after opening.

To mix, measure out the required amount of TURFTHOR WP. Pour this amount of TURFTHOR WP into the spray tank as it is being filled with water with the agitator operating.

To mix, open the outer container and remove the required number of unopened packets needed for the gallon amount of solution to be mixed. Drop the required number of packets into the spray tank as it is being filled with water with the agitator operating. The elapsed time until the packets are fully dissolved depends on the degree of agitation and the temperature of the water with more time needed for lower levels of agitation and lower temperatures. Generally, a few minutes is sufficient time for the packets to completely dissolve.

Avoid using TURFTHOR WP packets in tanks also containing products that contain boron or free chlorine. The packet material may react with the boron or chlorine to form a non-water soluble compound instead of dissolving into the water. However chlorinated water use is acceptable and will not cause this compound to form or reaction to occur. Because the packets are soluble in water but not oil, do not attempt to use packets in diesel oil or summer spray oils.

APPLICATION FOR TURF PESTS

TURFTHOR WP controls or suppresses a wide range of soil inhabiting turfgrass insect pests. TURFTHOR WP is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.

Application Sites

Permitted sites include but are not limited to lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses (not in California), cemeteries, airports and parks.

Application Timing

The active ingredient in TURFTHOR WP, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply TURFTHOR WP.

Turf Application Use Rates

Use Rate Table for TURFTHOR WP for Turf Applications	
Use Rate	Ounces (Packets) per 1,000 sq. feet
A	1.6 ounces (1 packet) per 6,250 to 11,000 sq. ft.
B	1.6 ounces (1 packet) per 8,250 sq. ft.

Use Rate Table for TURFTHOR WP for Turf Applications

Use Rate	Ounces per acre / Teaspoons per 1,000 sq. feet
A	6.4-8.6 ounces per acre / 3-4 level teaspoons per 1,000 sq. ft.
B	8.6 ounces per acre / 4 level teaspoons per 1,000 sq. ft.

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP

3 level teaspoons = 1 tablespoon

Turf Application Volumes

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass stemweevil, Cutworms (suppression only), European chaffer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chaffer, Oriental beetle, Phyllophaga spp., Southern masked chaffer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Application Recommendations Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adjuvant in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

Calculating Amounts of TURFTHOR WP to Mix for Turf Pests

To mix and apply any amount of TURFTHOR WP for turf pests based on number of square feet, determine:

A = # of Square feet of area to be treated / 1000 (for example 5,500 sq. ft. / 1000 = 5.5)

B = Applicable TURFTHOR WP Use Rate (teaspoons per 1000 square feet) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Teaspoons TURFTHOR WP to use = A X B

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

To mix and apply any amount of TURFTHOR WP for turf pests based on number of acres, determine:

A = # of acres of area to be treated = square feet of area to be treated / 43,560 (1 acre = 43,560 sq. ft.)

B = Applicable TURFTHOR WP Use Rate (ounces per acre) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Ounces TURFTHOR WP to use = A X B

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses (not in California) and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against insect pests. Applications to plants with hard to wet foliage such as ivy, pine or ivy should be applied in combination with a spreader / sticker.

Ornamental Application to Control Ants

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Respray as needed.

Mixing Table for TURFTHOR WP for Foliar Applications	
1.6 ounces (1 packet) per 300 gallons of water.	

Mixing Table for TURFTHOR WP for Foliar Applications	
Gallons Water	Level Teaspoons TURFTHOR WP
2.5	0.25
5.0	0.50
10.0	1.00
25.0	2.50
50.0	5.00
100.0	10.00

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP

3 level teaspoons = 1 tablespoon

Ornamental Pests Controlled by Foliar Application

Acaleids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for TURFTHOR WP for Broadcast Applications	
1.6 ounces (1 packet) per 6,250 to 11,000 sq. ft.	

Use Rate Table for TURFTHOR WP for Broadcast Applications	
6.4-8.6 ounces per acre / 3-4 level teaspoons per 1,000 sq. ft.	

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior landscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen-containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses (not in California) and interior landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Acaleids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Trees	
1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter	

Use Rate Table for TURFTHOR WP for Soil Injection for Trees	
0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) / 1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)	

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees	
1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter	

Use Rate Table for TURFTHOR WP for Soil Drench for Trees	
0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) / 1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)	

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs	
1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height	

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs	
0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height / 1 to 2 ounces per 30 cumulative feet of shrub height	

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs	
1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height	

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs	
0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height / 1 to 2 ounces per 30 cumulative feet of shrub height	

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

ATTENTION

Do not graze treated areas or use clippings from treated areas for feed or forage.

Avoid runoff or puddling of irrigation water following application.

Avoid application to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated or frozen.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Enysystex III, Inc., it is impossible for Enysystex III to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Enysystex III harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable laws, Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. TO THE EXTENT CONSISTENT WITH

3/8

APPLICABLE LAW. ENSYSTEX III MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Enysstex III, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Enysstex III shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX III AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX III, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

TURFTHOR is a registered trademark of Enysstex III, Inc.

Revised 07/07

82957-3

04/23/2007

1/5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Michael Kellogg
Ensystex III, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. N.W.
Gig Harbor, WA 98332

APR 23 2007

Dear Mr. Kellogg:

Subject: Labeling Amendment: Revisions to Directions for Use
Turthor WP
EPA Registration No. 82957-3
Date Submitted: March 22, 2007

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provision:

1. Within the DISCLAIMER OF WARRANTIES section of the label, revise the sentence "ENSYSTEX III MAKES NO WARRANTIES OF MERCHANTABILITY..." to read "TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ENSYSTEX III MAKES NO WARRANTIES OF MERCHANTABILITY..."

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment. If you have any questions regarding this letter, please contact Kable Bo Davis at (703) 306-0415.

Sincerely,

Venus Eagle

Venus Eagle
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure



TURFTHOR WP

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	25.0%
TOTAL:	100.0%

Keep water soluble packets in outer container until immediately before use. Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-3 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303

ACCOUNTED
FOR
DATE: APR 23 2007

This is a restricted use pesticide,
It is restricted for use as a pesticide
registered under EPA Reg. No.
82957-3

2/5

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(866)-367-8467 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Keep children and pets off treated area until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt and long pants, chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton and shoes plus socks (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

Do not apply more than 8.6 ounces (0.04 lbs.) of TURFTHOR WP per acre per year for any type(s) or combination(s) of applications.

Do not apply in greenhouses or nurseries.

Not for use on sod farm turf or grass grown for commercial seed production.

Not for use on bearing fruit or nut trees.

Do not apply through an irrigation system.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Enzyx Inc. at 1-866-367-8457 or Chemtrac at 1-800-424-9300 for any assistance.

DILUTION AND MIXING OF TURFTHOR WP

Each TURFTHOR WP outer container contains a number of clear water soluble packets. Do not allow the packets to become wet at any time before putting them into a spray tank at the time of intended mixing. Handling the packets with wet hands or gloves or in a rough manner can cause them to leak. Reseal the outer container if water soluble packets are left inside after opening.

To mix, measure out the required amount of TURFTHOR WP. Pour this amount of TURFTHOR WP into the spray tank as it is being filled with water with the agitator operating.

To mix, open the outer container and remove the required number of unopened packets needed for the gallon amount of solution to be mixed. Drop the required number of packets into the spray tank as it is being filled with water with the agitator operating. The elapsed time until the packets are fully dissolved depends on the degree of agitation and the temperature of the water with more time needed for lower levels of agitation and lower temperatures. Generally, a few minutes is sufficient time for the packets to completely dissolve.

Avoid using TURFTHOR WP packets in tanks also containing products that contain boron or free chlorine. The packet material may react with the boron or chlorine to form a non-water soluble compound instead of dissolving into the water. However chlorinated water use is acceptable and will not cause this compound to form or reaction to occur. Because the packets are soluble in water but not oil, do not attempt to use packets in diesel oil or summer spray oils.

APPLICATION FOR TURF PESTS

TURFTHOR WP controls or suppresses a wide range of soil inhabiting turfgrass insect pests. TURFTHOR WP is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.

Application Sites

Permitted sites include but are not limited to lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in TURFTHOR WP, Imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply TURFTHOR WP.

Turf Application Use Rates

Use Rate Table for TURFTHOR WP for Turf Applications	
Use Rate	Ounces (Packets) per 1,000 sq. feet
A	1.6 ounces (1 packet) per 8,250 to 11,000 sq. ft.
B	1.6 ounces (1 packet) per 8,250 sq. ft.

Use Rate Table for TURFTHOR WP for Turf Applications	
Use Rate	Ounces per acre / Teaspoons per 1,000 sq. feet

A	6.4-10.6 ounces per acre / 3-4 level teaspoons per 1,000 sq. ft.
B	8.6 ounces per acre / 4 level teaspoons per 1,000 sq. ft.

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP

3 level teaspoons = 1 tablespoon

Turf Application Volumes

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turgrass stemless, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, Phyllophaga spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Application Recommendations Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adjuvant in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

Calculating Amounts of TURFTHOR WP to Mix for Turf Pests

To mix and apply any amount of TURFTHOR WP for turf pests based on number of square feet, determine:

A = # of Square feet of area to be treated / 1000 (for example 5,500 sq. ft. / 1000 = 5.5)

B = Applicable TURFTHOR WP Use Rate (teaspoons per 1000 square feet) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Teaspoons TURFTHOR WP to use = A X B

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

To mix and apply any amount of TURFTHOR WP for turf pests based on number of acres, determine:

A = # of acres of area to be treated = square feet of area to be treated / 43,560 (1 acre = 43,560 sq. ft.)

B = Applicable TURFTHOR WP Use Rate (ounces per acre) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Ounces TURFTHOR WP to use = A X B

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against insect pests. Applications to plants with hard to wet foliage such as holly, pine or ivy should be applied in combination with a spreader / stickler.

Ornamental Application to Control Ants

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for TURFTHOR WP for Foliar Applications	
1.6 ounces (1 packet) per 300 gallons of water.	

Mixing Table for TURFTHOR WP for Foliar Applications	
Gallons Water	Level Teaspoons TURFTHOR WP
2.5	0.25
5.0	0.50
10.0	1.00
25.0	2.50
50.0	5.00
100.0	10.00

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP

3 level teaspoons = 1 tablespoon

Ornamental Pests Controlled by Foliar Application

Adeigids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for TURFTHOR WP for Broadcast Applications	
1.6 ounces (1 packet) per 8,250 to 11,000 sq. ft.	

Use Rate Table for TURFTHOR WP for Broadcast Applications	
6.4-8.6 ounces per acre / 3-4 level teaspoons per 1,000 sq. ft.	

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, Phyllophaga spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adeigids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Trees	
1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter	

Use Rate Table for TURFTHOR WP for Soil Injection for Trees	
0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) / 1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)	

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees	
1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter	

Use Rate Table for TURFTHOR WP for Soil Drench for Trees	
0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) / 1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)	

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs	
1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height	

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs	
0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height / 1 to 2 ounces per 30 cumulative feet of shrub height	

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs	
1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height	

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs	
0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height / 1 to 2 ounces per 30 cumulative feet of shrub height	

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

ATTENTION

Do not graze treated areas or use clippings from treated areas for feed or forage.

Avoid runoff or puddling of irrigation water following application.

Avoid application to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated or frozen.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Enysystex III, Inc., it is impossible for Enysystex III to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Enysystex III harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable laws, Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX III MAKES NO WARRANTIES

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OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of, seller or EnsysTex III, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, EnsysTex III shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX III AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX III, THE REPLACEMENT OF THE PRODUCT.

The Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

TURFTHOR is a registered trademark of EnsysTex III, Inc.

Revised 03/07



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR - 9

APR - 9 - 84V

April 4, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MICHAEL KELLOGG
PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX III, INC.
4110 136TH ST., NW
GIG HARBOR, WA 98332-

PRODUCT NAME: TURFTHOR WP
COMPANY NAME: ENSYSTEX III, INC.
EPA FILE SYMBOL: 82957-3
EPA RECEIPT DATE: 03/23/07

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. White".

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

March 22, 2007

COURIER DELIVERY

John Hebert (PM 7)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex III, Inc. – Turfthor WP (EPA Reg. No. 82957-3)
Submission of Amended Label

Dear Mr. Hebert,

On behalf of Ensystex III, Inc, please find the enclosed label amendment adding use directions for product NOT packaged in water-soluble packaging (WSP). With Ensystex III's application for registration dated January 24, 2006, Ensystex submitted two labels, one containing use directions for product packaged in WSP and the other with use directions for non-WSP packaged product. The Agency approved the Turfthor WP registration with Notice of Conditional Registration dated November 2, 2006 however, only the labeling containing use directions for product packaged in WSP was included with the registration notice. Therefore, Ensystex III has incorporated the non-WSP language into the Agency approved (WSP) label for Turfthor WP [this same approach was requested by the Agency for the approval of Ensystex III's Prothor WP product (EPA Reg. No. 82957-2)].

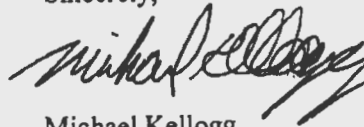
In support of this label amendment, please find the following:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Turfthor WP label with changes tracked
3. Five (5) copies of the Turfthor WP label with changes incorporated
4. Letter of Authorization

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed labeling, Ensystex III believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act of 2003.

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: David Nimocks; Ensystex III, Inc.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 82957-3	2. EPA Product Manager J. Hebert	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex III, Inc. / Turfthor WP	PM# 7	
5. Name and Address of Applicant (Include ZIP Code) Ensystex III, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Giga Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of amended labeling adding language for product to be packaged in non-WPS packaging. As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed labeling, Ensystex III believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act of 2003.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input checked="" type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) see attached	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
				see attached	see attached
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container see attached		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Michael Kellogg		Title Agent		Telephone No. (Include Area Code) 253-853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent			
4. Typed Name Michael Kellogg		5. Date 3/22/07			

Application for Registration (cont'd)

RE: Turfthor WP

Section III


Turfthor WP will be packaged in Water Soluble Packaging (WSP) and HDPE plastic bottles

Water Soluble Packaging (WSP):

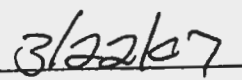
1.6 oz. (4, 16, or 88 per container) – water-soluble packets will be contained within HDPE plastic bottles.

Plastic Container Packaging (Non-WSP):

Ensystex III, Inc. will also package Turfthor WP in 16 oz. and 32 oz. HDPE plastic bottles.



Michael Kellogg
Pyxis Regulatory Consulting, Inc.



Date

ENSYSTEX III, Inc.

2709 Breezewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA
Telephone - 1-910-484-6163 x 203 Fax - 1-910-484-3378 Email david@ensystex.com

November 2, 2005

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensytex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

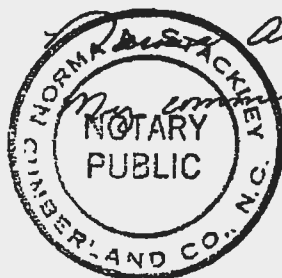
Sincerely,



David Nimocks
Chairman

cc: Pyxis Regulatory Consulting, Inc.

Notary



82957-3

03/02/2007

1/6



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Michael Kellogg, Agent
Pyxis Regulatory Consulting, Inc.
4110 136 St. NW
Gig Harbor, WA 98332

MAR 2 2007

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request Alternate Brand Name "Arborthor WP"
EPA Reg. No. 82957-3
Application Dated January 10, 2007

Dear: Mr. Kellogg,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 01/10/2007 for the above product. The Registration Division (RD) has conducted a preliminary screen of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

62816

2/6



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 82957-3	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex III, Inc. / Turfthor WP	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Ensystex III, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of the addition of an alternate brand name per PRN 98-10. The alternate brand name is "Arborthor WP". This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
* Certification must be submitted				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Michael Kellogg		Title Agent		Telephone No. (Include Area Code) (253) 853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent			
4. Typed Name Michael Kellogg		5. Date 11/10/97			

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

COURIER DELIVERY



ARBORTHOR WP

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	By Wt.
Imidacloprid	75.9%
Other Ingredients:	24.1%
TOTAL:	100.0%

Keep water soluble packets in outer container until immediately before use. Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82967-3 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que le expliquen la etiqueta o los elementos.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (387-8487) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and flush slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue flushing eye. • Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(800)-367-8487 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Keep children and pets off treated areas until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt and long pants, chemical resistant gloves made of any waterproof material such as butyl, nitrile, neoprene, or polyethylene. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Wash Hands: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of organophosphates that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

Do not apply more than 0.66 ounces (0.04 fl. oz.) of ARBORTHOR WP per acre per application, any type(s) or combination(s) of applications.

Do not apply in greenhouses or nurseries.

Not for use on seed farm turf or grass grown for commercial seed production.

Not for use on blooming fruit or nut trees.

Do not apply through an irrigation system.

Deleted: TURFTHOR

Deleted: TURFTHOR

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or purchase and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form a dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Enxetex III at 1-800-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

DILUTION AND MIXING OF ARBORTHOR WP

Each ARBORTHOR WP water soluble packet contains a number of clear water soluble packets. Do not allow the packets to become wet at any time before putting them into a spray tank at the time of intended mixing. Handling the packets with wet hands or gloves or in a rough manner can cause them to leak. Reuse the outer container if water soluble packets are left inside after opening.

To mix, open the outer container and remove the required number of unopened packets needed for the gallon amount of solution to be mixed. Drop the required number of packets into the spray tank as it is being filled with water with the agitator operating. The elapsed time until the packets are fully dissolved depends on the degree of agitation and the temperature of the water with more time needed for lower levels of agitation and lower temperatures. Generally, a few minutes is sufficient time for the packets to completely dissolve.

Avoid using ARBORTHOR WP packets in tanks also containing products that contain boron or boron chlorides. The packet material may react with the boron or chlorides to form a non-water soluble compound instead of dissolving into the water. However chlorinated water use is acceptable and will not cause this compound to form or reaction to occur. Because the packets are soluble in water but not oil, do not attempt to use packets in diesel oil or similar spray oils.

APPLICATION FOR TURF PESTS

ARBORTHOR WP controls or suppresses a wide range of soil inhabiting turfgrass insect pests. ARBORTHOR WP is not for use on lawns grown for seed production or for research.

Application Sites

Permitted sites include but are not limited to lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in ARBORTHOR WP, imidacloprid, has a systemic residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

ARBORTHOR WP can be mixed with other pesticides, fertilizers, fungicides and herbicides. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount ARBORTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply ARBORTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply ARBORTHOR WP.

Turf Application Use Rates

Use Rate Table for ARBORTHOR WP for Turf Applications	
Use Rate	Ounces (Packets) per 1,000 sq. foot
A	1.8 ounces (1 packet) per 8,260 to 11,000 sq. ft.
B	1.8 ounces (1 packet) per 8,260 sq. ft.

Turf Application Volumes

The calculated amount of ARBORTHOR WP can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it is not mixed with diluted volume such as under during will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of Annual bluegrass weevil, Asiatic garden beetle, Babup, Black flygrass meadow, Cutworms (suppression only), European chaffer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chaffer, Oriental beetle, Phyllophaga spp., Southern masked chaffer.

Use Rate B: Chinch bug (suppression only), Mole Crickets

Application Recommendations Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first winter nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an additional application with ARBORTHOR WP 7, 14, 21, 28, 35, 42, 49, 56, 63, 70, 77, 84, 91, 98, 105, 112, 119, 126, 133, 140, 147, 154, 161, 168, 175, 182, 189, 196, 203, 210, 217, 224, 231, 238, 245, 252, 259, 266, 273, 280, 287, 294, 301, 308, 315, 322, 329, 336, 343, 350, 357, 364, 371, 378, 385, 392, 399, 406, 413, 420, 427, 434, 441, 448, 455, 462, 469, 476, 483, 490, 497, 504, 511, 518, 525, 532, 539, 546, 553, 560, 567, 574, 581, 588, 595, 602, 609, 616, 623, 630, 637, 644, 651, 658, 665, 672, 679, 686, 693, 700, 707, 714, 721, 728, 735, 742, 749, 756, 763, 770, 777, 784, 791, 798, 805, 812, 819, 826, 833, 840, 847, 854, 861, 868, 875, 882, 889, 896, 903, 910, 917, 924, 931, 938, 945, 952, 959, 966, 973, 980, 987, 994, 1001, 1008, 1015, 1022, 1029, 1036, 1043, 1050, 1057, 1064, 1071, 1078, 1085, 1092, 1099, 1106, 1113, 1120, 1127, 1134, 1141, 1148, 1155, 1162, 1169, 1176, 1183, 1190, 1197, 1204, 1211, 1218, 1225, 1232, 1239, 1246, 1253, 1260, 1267, 1274, 1281, 1288, 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2457, 2464, 2471, 2478, 2485, 2492, 2499, 2506, 2513, 2520, 2527, 2534, 2541, 2548, 2555, 2562, 2569, 2576, 2583, 2590, 2597, 2604, 2611, 2618, 2625, 2632, 2639, 2646, 2653, 2660, 2667, 2674, 2681, 2688, 2695, 2702, 2709, 2716, 2723, 2730, 2737, 2744, 2751, 2758, 2765, 2772, 2779, 2786, 2793, 2800, 2807, 2814, 2821, 2828, 2835, 2842, 2849, 2856, 2863, 2870, 2877, 2884, 2891, 2898, 2905, 2912, 2919, 2926, 2933, 2940, 2947, 2954, 2961, 2968, 2975, 2982, 2989, 2996, 3003, 3010, 3017, 3024, 3031, 3038, 3045, 3052, 3059, 3066, 3073, 3080, 3087, 3094, 3101, 3108, 3115, 3122, 3129, 3136, 3143, 3150, 3157, 3164, 3171, 3178, 3185, 3192, 3199, 3206, 3213, 3220, 3227, 3234, 3241, 3248, 3255, 3262, 3269, 3276, 3283, 3290, 3297, 3304, 3311, 3318, 3325, 3332, 3339, 3346, 3353, 3360, 3367, 3374, 3381, 3388, 3395, 3402, 3409, 3416, 3423, 3430, 3437, 3444, 3451, 3458, 3465, 3472, 3479, 3486, 3493, 3500, 3507, 3514, 3521, 3528, 3535, 3542, 3549, 3556, 3563, 3570, 3577, 3584, 3591, 3598, 3605, 3612, 3619, 3626, 3633, 3640, 3647, 3654, 3661, 3668, 3675, 3682, 3689, 3696, 3703, 3710, 3717, 3724, 3731, 3738, 3745, 3752, 3759, 3766, 3773, 3780, 3787, 3794, 3801, 3808, 3815, 3822, 3829, 3836, 3843, 3850, 3857, 3864, 3871, 3878, 3885, 3892, 3899, 3906, 3913, 3920, 3927, 3934, 3941, 3948, 3955, 3962, 3969, 3976, 3983, 3990, 3997, 4004, 4011, 4018, 4025, 4032, 4039, 4046, 4053, 4060, 4067, 4074, 4081, 4088, 4095, 4102, 4109, 4116, 4123, 4130, 4137, 4144, 4151, 4158, 4165, 4172, 4179, 4186, 4193, 4200, 4207, 4214, 4221, 4228, 4235, 4242, 4249, 4256, 4263, 4270, 4277, 4284, 4291, 4298, 4305, 4312, 4319, 4326, 4333, 4340, 4347, 4354, 4361, 4368, 4375, 4382, 4389, 4396, 4403, 4410, 4417, 4424, 4431, 4438, 4445, 4452, 4459, 4466, 4473, 4480, 4487, 4494, 4501, 4508, 4515, 4522, 4529, 4536, 4543, 4550, 4557, 4564, 4571, 4578, 4585, 4592, 4599, 4606, 4613, 4620, 4627, 4634, 4641, 4648, 4655, 4662, 4669, 4676, 4683, 4690, 4697, 4704, 4711, 4718, 4725, 4732, 4739, 4746, 4753, 4760, 4767, 4774, 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5943, 5950, 5957, 5964, 5971, 5978, 5985, 5992, 5999, 6006, 6013, 6020, 6027, 6034, 6041, 6048, 6055, 6062, 6069, 6076, 6083, 6090, 6097, 6104, 6111, 6118, 6125, 6132, 6139, 6146, 6153, 6160, 6167, 6174, 6181, 6188, 6195, 6202, 6209, 6216, 6223, 6230, 6237, 6244, 6251, 6258, 6265, 6272, 6279, 6286, 6293, 6300, 6307, 6314, 6321, 6328, 6335, 6342, 6349, 6356, 6363, 6370, 6377, 6384, 6391, 6398, 6405, 6412, 6419, 6426, 6433, 6440, 6447, 6454, 6461, 6468, 6475, 6482, 6489, 6496, 6503, 6510, 6517, 6524, 6531, 6538, 6545, 6552, 6559, 6566, 6573, 6580, 6587, 6594, 6601, 6608, 6615, 6622, 6629, 6636, 6643, 6650, 6657, 6664, 6671, 6678, 6685, 6692, 6699, 6706, 6713, 6720, 6727, 6734, 6741, 6748, 6755, 6762, 6769, 6776, 6783, 6790, 6797, 6804, 6811, 6818, 6825, 6832, 6839, 6846, 6853, 6860, 6867, 6874, 6881, 6888, 6895, 6902, 6909, 6916, 6923, 6930, 6937, 6944, 6951, 6958, 6965, 6972, 6979, 6986, 6993, 7000, 7007, 7014, 7021, 7028, 7035, 7042, 7049, 7056, 7063, 7070, 7077, 7084, 7091, 7098, 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SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

ABORTHOR WP, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantings. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. **ABORTHOR WP** is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

ABORTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of **ABORTHOR WP** is realized when **ABORTHOR WP** is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining **ABORTHOR WP** with a fungicide containing ferrous phosphate or copper sulfate enhances the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantings at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

ABORTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Abeigids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and silver borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glasswinged sharpshooters), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil injection is not allowed in Nassau and Suffolk Counties of New York.

Soil Injection Use Rate for Trees

Use Rate Table for ABORTHOR WP for Soil Injection for Trees
1.0 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of **ABORTHOR WP** in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for ABORTHOR WP for Soil Drench for Trees
1.0 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of **ABORTHOR WP** in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil injection is not allowed in Nassau and Suffolk Counties of New York.

Soil Injection Use Rate for Shrubs

Use Rate Table for ABORTHOR WP for Soil Injection for Shrubs
1.0 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of **ABORTHOR WP** in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for ABORTHOR WP for Soil Drench for Shrubs
1.0 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of **ABORTHOR WP** in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

ATTENTION

Do not spray treated areas or use chemical from treated areas for food or forage.

Avoid runoff or puddling of irrigation water following application.

Avoid application to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated or frozen.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Enystex III, Inc., it is impossible for Enystex III to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Enystex III harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable laws, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENYSTEX III MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are applicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Enystex III, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Enystex III shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENYSTEX III AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENYSTEX III, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

ABORTHOR is a registered trademark of Enystex III, Inc.
Revised 01/07

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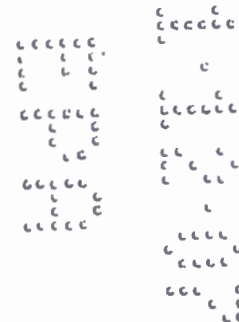
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PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

February 15, 2007

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex III, Inc. – Turfthor WP (EPA Reg. No. 82957-3)
Submission of Certification with Respect to Citation of Data

Dear Ms. Eagle,

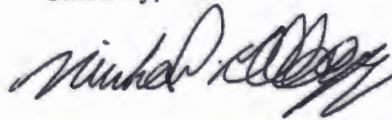
On behalf of Ensystex III, Inc, please find the enclosed documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. Completed Certification with Respect to Citation of Data
3. Letter of Authorization

Ensystex III apologizes for not providing this Certification earlier, but because the registration was granted several months earlier than expected and because Ensystex III was not provided notice in advance of the registration, we were unable to provide it earlier.

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: David Nimocks; Ensystex III, Inc.



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 82957-3	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex III, Inc. / Turfthor WP	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Ensystex III, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>Nov. 2, 2006</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of Certification with Respect to Citation of Data.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container		<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Michael Kellogg	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Michael Kellogg	5. Date 2/15/07	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Ensystex III, Inc.; 2709 Breezewood Avenue; Fayetteville, NC 28303	EPA Registration Number/File Symbol 82957-3
Active Ingredient(s) and/or representative test compound(s) imidacloprid	Date February 15, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Nonfood, domestic outdoor	Product Name Turfthor WP

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Michael Kellogg

Date

2/15/07

Typed or Printed Name and Title

Michael Kellogg; Agent

ENSYSTEX III, Inc.

2709 Breezewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA
Telephone - 1-910-484-6163 x 203 Fax - 1-910-484-3378 Email david@ensystex.com

November 2, 2005

To Whom It May Concern:

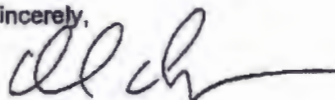
Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensytex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

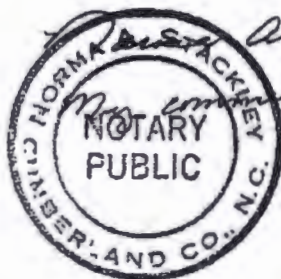
Sincerely,



David Nimocks
Chairman

cc: Pyxis Regulatory Consulting, Inc.

Notary



*Norma A. Stackley, Notary Public
Commission Expires 4-21-06*

82957-3

01/31/2007

1/6



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 31 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Michael Kellogg, Agent
Etigra c/o
Pyxis Regulatory Consulting, Inc.
4110 136 St. NW
Gig Harbor, WA 98332

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request Alternate Brand Name "Arborthor WSP"
EPA Reg. No. 82957-3
Application Dated January 10, 2007

Dear: Mr. Kellogg,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 01/10/2007 for the above product. The Registration Division (RD) has conducted a preliminary screen of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

Rachel C. Holloman

for Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



ARBORTHOR WSP

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	25.0%
TOTAL:	100.0%

Keep water soluble packets in outer container until immediately before use. Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82967-3 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que le expliquen la etiqueta o hasta que le expliquen el producto.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303

FIRST AID	
If swallowed	<ul style="list-style-type: none"> Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(800)-367-8467 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Keep children and pets off treated areas until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt and long pants, chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton and shoes plus socks (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of organophosphates that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

Do not apply more than 8.6 ounces (0.64 lbs.) of ARBORTHOR WSP per acre per application for any type(s) or combination(s) of applications.

Do not apply in greenhouses or nurseries.

Not for use on soil from turf or grass grown for commercial seed production.

Not for use on bearing fruit or nut trees.

Do not apply through an irrigation system.

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STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact. Isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, soil, or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Enzytech Inc. at 1-800-387-6487 or Chemagro at 1-800-424-9300 for any assistance.

DILUTION AND MIXING OF ARBORFORTH WSP

Each ARBORFORTH WSP outer container contains a number of clear water soluble packets. Do not allow the packets to become wet at any time before putting them into a spray tank at the time of intended mixing. Handling the packets with wet hands or gloves or in a rough manner can cause them to leak. Reseal the outer container if water soluble packets are left inside after opening.

To mix, open the outer container and remove the required number of unopened packets needed for the gallon amount of solution to be mixed. Drop the required number of packets into the spray tank as it is being filled with water with the agitator operating. The elapsed time until the packets are fully dissolved depends on the degree of agitation and the temperature of the water with more time needed for lower levels of agitation and lower temperatures. Generally, a few minutes is sufficient time for the packets to completely dissolve.

Avoid using ARBORFORTH WSP packets in tanks also containing products that contain boron or free chlorine. The packet material may react with the boron or chlorine to form a non-water soluble compound instead of dissolving into the water. However chlorinated water use is acceptable and will not cause this compound to form or reaction to occur. Because the packets are soluble in water but not oil, do not attempt to use packets in diesel oil or summer spray oils.

APPLICATION FOR TURF PESTS

ARBORFORTH WSP controls or suppresses a wide range of soil inhabiting turfgrass insect pests. ARBORFORTH WSP is not for use on turfgrass grown for sale (seed farms), commercial seed production or for research.

Application Sites

Permitted sites include but are not limited to lawns, grounds and landscapes of and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in ARBORFORTH WSP, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on pest experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

ARBORFORTH WSP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount of ARBORFORTH WSP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply ARBORFORTH WSP solution as a spray of uniform, coarse droplets at a pressure low enough to shroud droplets from the target area. Properly calibrated application equipment must be used to apply ARBORFORTH WSP.

Turf Application Use Rates

Use Rate Table for ARBORFORTH WSP for Turf Applications	
Use Rate	Ounces (Packets) per 1,000 sq. feet
A	1.8 ounces (1 packet) per 8,250 to 11,000 sq. ft.
B	1.8 ounces (1 packet) per 8,250 sq. ft.

Turf Application Volumes

The calculated amount of ARBORFORTH WSP can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of Annual bluegrass weevil, Asiatic garden beetle, weevil, Black turfgrass stem-borer, Cutworms (suppression only), European chafers, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafers, Oriental beetle, Phyllophaga spp., Southern masked chafers.

Use Rate B: Chinch bug (suppression only), Mole crickets.

Application Recommendations Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply on schedule in conjunction with ARBORFORTH WSP if spots of heavy traffic are observed and turning at the time of application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

ARBORFORTH WSP, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantings. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. ARBORFORTH WSP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

ARBORFORTH WSP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of ARBORFORTH WSP is realized when ARBORFORTH WSP is applied to or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining ARBORFORTH WSP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantings of and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

ARBORFORTH WSP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Foliar Application

Foliar application of ARBORFORTH WSP offers local systemic activity against insect pests. Applications to plants with hard to wet foliage such as Holly, Yucca or Ivy should be applied in combination with a spreader / sticker.

Ornamental Application to Control Ants

ARBORFORTH WSP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of ARBORFORTH WSP (from the table below) in that quantity of water. Begin watering prior to establishment of high pest populations. Reapply as needed.

Mixing Table for ARBORFORTH WSP for Foliar Applications	
	1.8 ounces (1 packet) per 300 gallons of water.

Ornamental Pests Controlled by Foliar Application

Aphids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Trips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for ARBORFORTH WSP for Broadcast Applications	
	1.8 ounces (1 packet) per 8,250 to 11,000 sq. ft.

Broadcast Application Volumes and Application Methods

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into lawns before seed before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, Phyllophaga spp., Asiatic garden beetle, Oriental beetle.

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SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

ABSORBTHOR WSP, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantings. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. **ABSORBTHOR WSP** is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

ABSORBTHOR WSP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of **ABSORBTHOR WSP** is realized when **ABSORBTHOR WSP** is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining **ABSORBTHOR WSP** with a nitrogen containing fertilizer may accelerate its otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil drenched applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantings at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

ABSORBTHOR WSP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first making a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Aphids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Euallotus longhorned borer, Flatheaded borers (including bronze birch borer and elder borer), Japanese beetles, Leaf beetles, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including green-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soil scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for ABSORBTHOR WSP for Soil Injection for Trees
1.6 ounces (1 quart) per 24 to 48 inches of cumulative trunk diameter

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of **ABSORBTHOR WSP** in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on a 2.5 foot centers in a grid pattern in the soil beneath the tree's branch/foliage out to the tree's drip line.

Band Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for ABSORBTHOR WSP for Soil Drench for Trees
1.6 ounces (1 quart) per 24 to 48 inches of cumulative trunk diameter

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of **ABSORBTHOR WSP** in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for ABSORBTHOR WSP for Soil Injection for Shrubs
1.6 ounces (1 quart) per 24 to 48 cumulative ft. of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of **ABSORBTHOR WSP** in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for ABSORBTHOR WSP for Soil Drench for Shrubs
1.6 ounces (1 quart) per 24 to 48 cumulative ft. of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of **ABSORBTHOR WSP** in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

ATTENTION

Do not apply treated areas or use chemical from treated areas for food or forage.

Avoid runoff or puddling of irrigation water following application.

Avoid application to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated, or frozen.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product of once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensyntex II, Inc., it is impossible for Ensyntex II to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensyntex II harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable laws, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYNTEX II MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensyntex II, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensyntex II shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYNTEX II AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYNTEX II, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

ABSORBTHOR is a registered trademark of Ensyntex II, Inc.
Revised 10/07

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United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 82957-3	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex III, Inc. / Turfthor WP	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Ensystex III, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of the addition of an alternate brand name per PRN 98-10. The alternate brand name is "Arborthor WSP". This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
* Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Michael Kellogg	Title Agent	Telephone No. (Include Area Code) (253) 953-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Michael Kellogg	5. Date 11/10/07	

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

COURIER DELIVERY

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

January 10, 2007

COURIER DELIVERY

Venus Eagle (PM1)
Document Processing Desk (FNL LBL)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex III, Inc. – Turfthor WP (EPA Reg. No. 82957-3)
Submission of Final Product Labeling per the Agency Letter dated November 2, 2006

Dear Ms. Eagle,

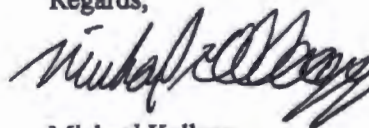
On behalf of Ensystex III, Inc., please find the enclosed final labeling for Turfthor WP (EPA Reg. No. 82957-3) per the Agency letter dated November 2, 2006.

In support of this submission, enclosed are the following documents:

1. Application for Pesticide Registration (EPA Form 8570-1)
2. Two (2) copies of the Turfthor WP final label
3. Letter of Authorization

Please feel free to contact me if you have any questions or need any additional information.

Regards,



Michael Kellogg

Enclosures

cc: David Nimocks, Ensystex III, Inc.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number
82957-3

2. EPA Product Manager
V. Eagle

3. Proposed Classification
☒ None ☐ Restricted

4. Company/Product (Name)
Ensystex III, Inc. / Turfthor WP

PM#
1

5. Name and Address of Applicant (Include ZIP Code)
Ensystex III, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

☐ Check if this is a new address

Section - II

☐ Amendment - Explain below.

☒ Final printed labels in response to Agency letter dated 11/2/2006

☐ Resubmission in response to Agency letter dated _____

☐ "Me Too" Application.

☐ Notification - Explain below.

☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of final product labeling per the Agency letter dated November 2, 2006.

Section - III**1. Material This Product Will Be Packaged In:**

Child-Resistant Packaging

☐ Yes
☐ No

Unit Packaging

☐ Yes
☐ No

Water Soluble Packaging

☐ Yes
☐ No

2. Type of Container

☐ Metal
☐ Plastic
☐ Glass
☐ Paper
☐ Other (Specify) _____

* Certification must
be submitted

If "Yes"
Unit Packaging wgt.

No. per
container

If "Yes"
Package wgt

No. per
container

3. Location of Net Contents Information

☐ Label ☐ Container

4. Size(s) Retail Container

5. Location of Label Directions

☐ On Label
☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product

☐ Lithograph
☐ Paper glued
☐ Stenciled

☐ Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name
Michael Kellogg

Title
Agent

Telephone No. (Include Area Code)
(253) 853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application
Received
(Stamped)

2. Signature

3. Title
Agent

4. Typed Name

Michael Kellogg

5. Date

11/10/07

ENSYSTEX III, Inc.

2709 Breezewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA
Telephone - 1-910-484-6163 x 203 Fax - 1-910-484-3378 Email david@ensystex.com

November 2, 2005

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensystex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,



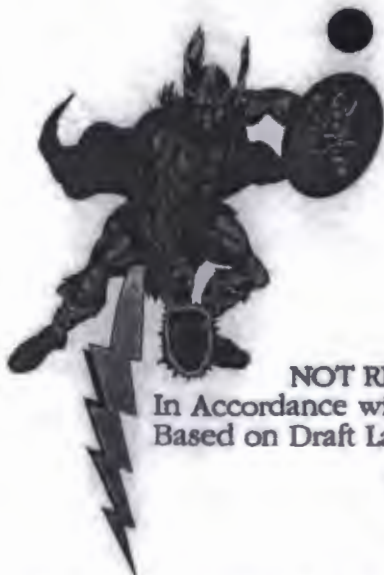
David Nimocks
Chairman

cc: Pyxis Regulatory Consulting, Inc.

Notary



A. Stackley, Notary Public
My Commission Expires 4-21-06



NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated

NOV - 2 2006

TURFTHOR WP

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	25.0%
TOTAL:	100.0%

Keep water soluble packets in outer container until immediately before use. Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-3 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

ENSYSTEX III, Inc.

FIRST AID

If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(866)-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Keep children and pets off treated areas until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt and long pants, chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton and shoes plus socks (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

Do not apply more than 8.6 ounces (0.04 lbs.) of TURFTHOR WP per acre per year for any type(s) or combination(s) of applications.

Do not apply in greenhouses or nurseries.

Not for use on sod farm turf or grass grown for commercial seed production.

Not for use on bearing fruit or nut trees.

Do not apply through an irrigation system.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Enzytelex III at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

DILUTION AND MIXING OF TURFTHOR WP

Each TURFTHOR WP outer container contains a number of clear water soluble packets. Do not allow the packets to become wet at any time before putting them into a spray tank at the time of intended mixing. Handling the packets with wet hands or gloves or in a rough manner can cause them to leak. Reseal the outer container if water soluble packets are left inside after opening.

To mix, open the outer container and remove the required number of unopened packets needed for the gallon amount of solution to be mixed. Drop the required number of packets into the spray tank as it is being filled with water with the agitator operating. The elapsed time until the packets are fully dissolved depends on the degree of agitation and the temperature of the water with more time needed for lower levels of agitation and lower temperatures. Generally, a few minutes is sufficient time for the packets to completely dissolve.

Avoid using TURFTHOR WP packets in tanks also containing products that contain boron or free chlorine. The packet material may react with the boron or chlorine to form a non-water soluble compound instead of dissolving into the water. However chlorinated water use is acceptable and will not cause this compound to form or reaction to occur. Because the packets are soluble in water but not oil, do not attempt to use packets in diesel oil or summer spray oils.

APPLICATION FOR TURF PESTS

TURFTHOR WP controls or suppresses a wide range of soil inhabiting turfgrass insect pests. TURFTHOR WP is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.

Application Sites

Permitted sites include but are not limited to lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in TURFTHOR WP, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply TURFTHOR WP.

Turf Application Use Rates

Use Rate Table for TURFTHOR WP for Turf Applications	
Use Rate	Ounces (Packets) per 1,000 sq. feet
A	1.6 ounces (1 packet) per 8,250 to 11,000 sq. ft.
B	1.6 ounces (1 packet) per 8,250 sq. ft.

Turf Application Volumes

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass stem borer, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Application Recommendations Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantings. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 80 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantings at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against insect pests. Applications to plants with hard to wet foliage such as holly, pine or ivy should be applied in combination with a spreader / sticker.

Ornamental Application to Control Ants

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for TURFTHOR WP for Foliar Applications	
1.6 ounces (1 packet)	per 300 gallons of water.

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Trips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for TURFTHOR WP for Broadcast Applications	
1.6 ounces (1 packet)	per 8,250 to 11,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Trees
1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees
1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs
1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs
1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

ATTENTION

Do not graze treated areas or use clippings from treated areas for feed or forage.

Avoid runoff or puddling of irrigation water following application.

Avoid application to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated or frozen.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Enysystex III, Inc., it is impossible for Enysystex III to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Enysystex III harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable laws, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX III MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Enysystex III, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Enysystex III shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX III AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX III, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

TURFTHOR is a registered trademark of Enysystex III, Inc.

Revised 01/07



TURFTHOR WP

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior landscapes.

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	25.0%
TOTAL:	100.0%

Keep water soluble packets in outer container until immediately before use. Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-3 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303

FIRST AID

If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. • Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(866)-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Keep children and pets off treated areas until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt and long pants, chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton and shoes plus socks (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

Do not apply more than 8.6 ounces (0.04 lbs.) of TURFTHOR WP per acre per year for any type(s) or combination(s) of applications.

Do not apply in greenhouses or nurseries.

Not for use on sod farm turf or grass grown for commercial seed production.

Not for use on bearing fruit or nut trees.

Do not apply through an irrigation system.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensysiax III at 1-888-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

DILUTION AND MIXING OF TURFTHOR WP

Each TURFTHOR WP outer container contains a number of clear water soluble packets. Do not allow the packets to become wet at any time before putting them into a spray tank at the time of intended mixing. Handling the packets with wet hands or gloves or in a rough manner can cause them to leak. Reseal the outer container if water soluble packets are left inside after opening.

To mix, open the outer container and remove the required number of unopened packets needed for the gallon amount of solution to be mixed. Drop the required number of packets into the spray tank as it is being filled with water with the agitator operating. The elapsed time until the packets are fully dissolved depends on the degree of agitation and the temperature of the water with more time needed for lower levels of agitation and lower temperatures. Generally, a few minutes is sufficient time for the packets to completely dissolve.

Avoid using TURFTHOR WP packets in tanks also containing products that contain boron or free chlorine. The packet material may react with the boron or chlorine to form a non-water soluble compound instead of dissolving into the water. However chlorinated water use is acceptable and will not cause this compound to form or reaction to occur. Because the packets are soluble in water but not oil, do not attempt to use packets in diesel oil or summer spray oils.

APPLICATION FOR TURF PESTS

TURFTHOR WP controls or suppresses a wide range of soil inhabiting turfgrass insect pests. TURFTHOR WP is not for use on turfgrass grown for sale (seed farms), commercial seed production or for research.

Application Sites

Permitted sites include but are not limited to lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in TURFTHOR WP, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply TURFTHOR WP.

Turf Application Use Rates

Use Rate Table for TURFTHOR WP for Turf Applications	
Use Rate	Ounces (Packets) per 1,000 sq. feet
A	1.6 ounces (1 packet) per 8,250 to 11,000 sq. ft.
B	1.6 ounces (1 packet) per 8,250 sq. ft.

Turf Application Volumes

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass etanienus, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Application Recommendations Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantings. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantings at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against insect pests. Applications to plants with hard to wet foliage such as holly, pine or ivy should be applied in combination with a spreader / sticker.

Ornamental Application to Control Ants

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for TURFTHOR WP for Foliar Applications

1.6 ounces (1 packet) per 300 gallons of water.

Ornamental Pests Controlled by Foliar Application

Adeigids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Trips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for TURFTHOR WP for Broadcast Applications

1.6 ounces (1 packet) per 8,250 to 11,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Trees

1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter
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Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees
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1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter
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Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs
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1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs

1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

ATTENTION

Do not graze treated areas or use clippings from treated areas for feed or forage.

Avoid runoff or puddling of irrigation water following application.

Avoid application to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated or frozen.

IMPORTANT READ BEFORE USE

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